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for the benefit of creditors. *Wineman v. Electrical Manfg. Co.*, 118 Mich. 636, which holds as above, says that a chattel mortgage may be an assignment in a "narrow sense of the word." It is admitted in the principal case that the same evils may be effected by means of chattel mortgages that the SALES IN BULK ACT guards against in sales, exchanges and assignments.

CONSTITUTIONAL LAW—PROSPECTIVE EFFECT OF AMENDMENT.—Defendant, as tax collector, demanded a license tax from plaintiff company under act approved July 6, 1910, imposing license taxes on those engaged in mining pursuits. Plaintiff claims exemption on the ground that the act is unconstitutional in so far as it applies to mining pursuits. The State constitution at the time of the passage of the act prohibited such a tax. But the act in question contained the following clause: "That this act shall not go into effect unless and until the proposed amendment to the constitution of this State, amending article 229 thereof, has been adopted which amendment is to be submitted to the people as provided by this Legislature." The amendment was adopted in November, 1910. *Held*, that the act was unconstitutional when passed, and was not validated by the later amendment in which the act was not referred to. *Etchison Drilling Co. v. Flournoy* (La. 1912) 59 South. 867.

An act to take effect on the happening of a future event is valid. But an act which is void when made, cannot be validated by postponing its effect until such time that it would, if then passed, be valid. The statute in question was an enabling act, passed in advance of the adoption of a proposed constitutional amendment. In *Coguenham v. Avoca Drainage District*, 130 La. 323, 57 South. 989, the same court said on the question whether such anticipatory legislation was valid: "No reason is suggested why it should not be." But the court now points out that that remark was unnecessary to the decision of the case, as the amendment was there self-executing. Such legislation is now declared in the principal case to be without precedent. An act passed the day before the enabling amendment (which had already been adopted by the people) was ratified by the legislature, was held to be part of the same legislation and valid in *Galveston v. Gröss*, 47 Tex. 428. That is apparently the nearest of any decision to the principal case. The principal case follows the rule laid down by COOLEY, CONSTITUTIONAL LIMITATIONS, 97, that a constitution should operate prospectively only, unless the words employed in the constitution or amendment itself show a clear intention that it should have a retrospective effect.

CONTRACTS—RECOVERY OF MONEY PAID TO STIFLE PROSECUTION.—Plaintiffs, having violated the liquor laws, stifled prosecution by the payment of money to a so-called Law and Order League, which had started a number of prosecutions against plaintiff for the illegal sale of intoxicating liquors. The evidence showed that the defendants, who were members of the League, in collusion with the Judge of the Police Court, brought these prosecutions for the purpose of extorting money from plaintiffs for their private benefit. Plaintiffs after the statute of limitations barred further prosecution against them, brought suit to recover the money paid to the defendants. *Held*, that